

Rowena Santos (SBN 210185)  
rsantos@slpattorney.com  
Rodney Gi (SBN 268687)  
rgi@slpattorney.com  
**STRATEGIC LEGAL PRACTICES**  
A PROFESSIONAL CORPORATION  
1840 Century Park East, Suite 430  
Los Angeles, CA 90067  
Telephone: (310) 929-4900  
Facsimile: (310) 943-3838

Dara Tabesh (SBN 230434)  
dara.tabesh@ecotechlaw.com  
**EcoTech Law Group, P.C.**  
5 Third St. Ste. 700  
San Francisco, CA 94103  
Telephone: (415) 503-9194  
Facsimile: (415) 651-8639

Attorneys for Plaintiff ABRAHAM FOROUZAN

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

ABRAHAM FOROUZAN,

Plaintiff,

v.

BMW OF NORTH AMERICA, LLC et  
al.,

Defendants.

Case No.: 2:17-cv-3875-DMG-GJS

[Assigned to the Hon. Dolly M. Gee]

**DECLARATION OF DARA  
TABESH IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
BMW OF NORTH AMERICA'S  
MOTION *IN LIMINE* TO  
EXCLUDE IMPROPER LEGAL  
OPINIONS UNDER DAUBERT**

Hearing: May 29, 2018, 2:00 p.m.  
Trial Date: June 26, 2018

**DECLARATION OF DARA TABESH**

I, Dara Tabesh, declare as follows:

1. I am over the age of 18 and not a party to the action. I am an attorney at law, duly admitted and licensed to practice before all courts of this State and I am an associate of EcoTech Law Group, P.C., located at 5 Third St., Suite 700, San Francisco, CA 94103. I am one of the attorneys of record for Plaintiff in this action and my knowledge of the information and events described herein derives from a combination of my personal knowledge and a careful review of the file, relevant court records and communications with other Plaintiff's counsel, and if called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiff's Opposition to BMW of North America's Motion in Limine to Exclude Improper Legal Opinions Under Daubert.

3. Attached as Exhibit 1 to this declaration is a true and correct copy of the relevant portion of the transcript from the May 4, 2018 deposition of Plaintiff's expert, Dan Calef, in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of May 2018 in San Francisco, California.

/S/ Dara Tabesh

Dara Tabesh, Esq.